



Office of the Director

April 2020

Dear District of Columbia Councilmembers:

On behalf of Mayor Bowser, the DC Office of Planning (“OP”) is pleased to transmit proposed amendments to Chapters 1 and 3-25 of the District Elements of the Comprehensive Plan for prompt Council consideration and approval. This update is the product of unprecedented public engagement and careful consideration by District officials. An approved update is critically needed to ensure Washington, DC is able address the challenges and opportunities that we face today. The existing Comprehensive Plan, which was enacted in 2006 and underwent a minor amendment in 2011, is more reflective of the challenges and environment of a decade ago than today. To assist the Council in its review of this Comprehensive Plan update, this staff report provides background on the Comprehensive Plan, describes the process of drafting the current update, and identifies key changes proposed in this update.

### Overview

The Comprehensive Plan is a high-level guide that sets a positive, long-term vision for the physical development of the District. We know that the city will grow and change. The role of the Comprehensive Plan is to help guide that change toward a positive future both for today's residents and for our children and grandchildren.

The Comprehensive Plan establishes a context and sets broad goals to inform public decision-making and fine-grained planning efforts. It informs zoning regulations and capital budgeting. However, it does not have the force of law or regulation. In its current form, the Comprehensive Plan reflects the context, aspirations and trends of the late 1990s and early 2000s. Consequently, it does not effectively address the current challenges of housing, equity, resilience, and public resources, nor the change we expect in the future. Thus, the urgent need to approve this update.

### History of the Comprehensive Plan

The first Comprehensive Plan was produced in 1950 by the National Capital Park and Planning Commission, which was charged with planning for the District’s parks and playgrounds, land use, transportation, and public facilities. The Commission produced another Comprehensive Plan in 1961, and another in 1967, which proposed radical changes to the city’s landscape, including freeways and urban renewal.



In 1973, the federal Home Rule Act designated the Mayor of the District of Columbia as the city's principal planner. The Comprehensive Plan was divided into "District" Elements to be prepared by the District's Office of Planning, and "Federal" Elements to be prepared by the National Capital Planning Commission (NCPC). The first Comprehensive Plan of the post-Home Rule era was completed in 1984. Between 1984 and 2005, the District Elements were amended four times. A 1985 amendment added the Land Use Element and maps. The 1989 and 1994 amendments added Ward Plans to the document, roughly tripling its size. The 1998 amendments included a variety of map and text changes to reflect then-current conditions.

In 2004, as the District was emerging from the federal control board and as its population decline had come to an end, the District commenced a full rewrite of the Comprehensive Plan that would analyze existing conditions and trends, engage residents, and provide a fresh look at the District's future. The DC Council adopted the new Comprehensive Plan in 2006. In 2011, the District adopted a minor amendment to the 2006 Comprehensive Plan, consisting primarily of technical corrections and a limited number of policy updates. In 2016, OP launched a second amendment to the 2006 Comprehensive Plan, resulting in an update with substantial and much needed revisions reflecting our city's current context and needs.

#### Update vs. Rewrite

The scope, document structure, public engagement, and time period of this Comprehensive Plan update reflect that this amendment cycle is a "major update/revision" as defined in the current Implementation Element (2514.2). The full rewrite in 2006 was preceded by a two-year long assessment and visioning process that culminated in a document, "A Vision for an Inclusive City" that served as the foundation for the new Comprehensive Plan. The extensive public engagement for this update centered around revisions to the existing document. For example, during the open call for amendments, OP invited the public to provide feedback on the existing document. Moreover, this update maintains the existing structure of the 2006 Comp Plan text and maps, and the policies and actions are provided for a five-year timeline and not a new 20-year horizon. This update did not involve the visioning and document re-structuring of a rewrite, but it did involve more substantial updating and outreach than the 2011 update. OP anticipates that the next amendment cycle, as called for in the current Implementation Element, will be a full rewrite.

#### The Comprehensive Plan Update and Coronavirus

While the draft update of the Comprehensive Plan was available for public review, a new and aggressively contagious Coronavirus emerged in Wuhan, China, infecting thousands of people across the globe and causing Coronavirus Disease (COVID-19). In response, Mayor Bowser issued orders to close nonessential businesses and, along with the governors of Maryland and Virginia, issued a stay at home order. The number of cases and deaths caused by COVID-19 and the economic and social impacts of the resulting crisis are still unknown, but even when related data become available, it will take months and possibly years to fully comprehend and respond to the impacts of this public health emergency.

The 2020 public health emergency and resulting economic crisis arising from COVID-19 have altered and will continue to change many aspects of Washington, DC and its residents' lives. This experience also highlights the importance of a relevant and updated Comprehensive Plan. A long-term, high-level plan is always important, but especially during uncertain times and emergencies. The Comprehensive Plan serves as a critical anchor to help the District move toward its goals based on its underlying values, which remain unchanged during unexpected and traumatic events. The policies set forth in the Comprehensive Plan can unify and align communities as well as address unprecedented circumstances and their ongoing effects.

COVID-19 first appeared in the District during the final months of a nearly half-decade process of updating the Comprehensive Plan. As the District Government grappled with the immediate effects through unprecedented action, such as moving some agencies to operate on a fully remote basis, OP took a hard look to determine whether and how to move forward with the Comprehensive Plan.

Upon analyzing the Comprehensive Plan in light of the public health emergency, OP confirmed that it stands up to many of the changes we are experiencing and will continue to experience. Given the level of public and agency feedback that is represented in this update, the Mayor's proposal embodies the best planning and thinking of the District over the last few years. The Comprehensive Plan will continue to serve as a critical guide for responding and recovering from this dual public health and economic crisis. Especially notable in this update are valuable additions around resilience, equity, housing, and public facilities that are more relevant than ever. We made targeted adjustments to broaden language given that much of the focus of disaster-related language was placed on physical disasters and economic language did not anticipate a pandemic-driven economic downturn. We added new policies and actions related to ongoing monitoring, response, and recovery related to this event.

We recognize that in a time of crisis, while tracking and responding to immediate needs, considering the broader goals and vision of the District is challenging. Hence this Comprehensive Plan will serve as that reminder and guide, as we all come together to work toward a more equitable and resilient District than ever before.

#### Public Engagement Process

Public engagement has been a hallmark of the Comprehensive Plan update process and has been broader and deeper outreach of any previous effort for an update. Through various engagement events and venues, OP has heard from tens of thousands of residents and stakeholders. This input has helped shape the update. In 2016, OP kicked off the amendment cycle by hosting seven town hall meetings across the District. Then, in 2017, during the official open call for amendments, OP held over 100 community-based office hours across all eight wards. The open call process yielded over 3,000 amendment proposals. OP also incorporated public input from other venues, including feedback provided through the DC Council's review of the Framework Element in 2018 and 2019; OP's 2019 DC Values Campaign, which reached nearly 3,100 residents and stakeholders across all eight wards; and numerous housing

engagements in 2019. The update integrates more than 40 plans produced by District agencies, including small area plans, the preparation of which entailed hundreds of public engagements. In October 2019, OP launched the final public review process, and took several steps to prioritize meaningful ANC participation, including holding trainings about the process and timeline; hosting ANC-specific trainings about key changes; and attending ANC meetings. As a result, OP received 33 official ANC resolutions.

The public review process for the draft Comprehensive Plan update illustrates how OP has balanced our commitment to robust public engagement with the urgent need to deliver the proposal to the Council in time to allow for the Council to approve it before the end of 2020. Upon the draft update's release, OP heard from many residents, ANCs, and stakeholders who support moving the process to adopt the Comprehensive Plan forward with all deliberate speed, because they desire to see their input reflected in an updated, adopted Comprehensive Plan. Others asked that the review period be extended, and in response it was extended to ultimately to provide 88 days for the public and 123 days for ANCs. This time frame represents the longest period of feedback provided for a draft Comprehensive Plan.

Moving forward, OP remains committed to public engagement. Each ANC that provided feedback on the public review draft will receive a written response from OP with information regarding the inclusion of their feedback in the Comprehensive Plan amendment. The DC Council will receive all the feedback submitted by the public and ANCs. In addition, ANCs will be able to arrange for OP staff to discuss with them and review the feedback. Also, OP staff will deploy a series of communications throughout the Spring and Summer months to share the Comprehensive Plan Update with residents. OP intends to support a range of community discussions subsequent to the resolution of the COVID-19 public health emergency as part of our ongoing work. Moreover, we anticipate that the DC Council will provide final opportunities for public input prior to adopting the approved Comprehensive Plan, and we stand ready to engage with residents through the Council process.

#### Significant Updates to the Comprehensive Plan

The significant changes included in the update fall into five broad categories: COVID-19, housing, equity, resilience, and public resources.

1. COVID-19: The Introduction and several Citywide Elements were refined to align with the new landscape created by the recent emergence of the Coronavirus and resulting COVID-19 disease. The refinements include expanding language around resilience, response and recovery, and public health emergencies, as well as modifying language related to the economy.
2. Housing: The Housing Element was modified to reflect the District's goal of producing 36,000 new units by 2025, of which 12,000 will be affordable to low- and moderate-income households, and to address pressing issues across the housing continuum, from homelessness to homeownership. The updated Housing Element includes definitions and policies related to housing affordability and physical, economic and cultural

displacement and housing for specific populations (i.e. seniors, large family households, etc.).

3. **Equity:** The update includes a supplemental Equity Crosswalk that highlights Comprehensive Plan policies and actions that explicitly address racial equity. Taken together, these policies will help to deliver on the equity goals expressed in the Framework Element and make a tangible difference in the lives of DC residents who have yet to reap the benefits of the growth and change in the city. Additionally, throughout the Citywide Elements, the update highlights important data and trends related to disparities across race and income. These data become important benchmarks to evaluate the effectiveness of our policies and actions toward meeting racial equity goals stated in the Framework element.
4. **Resilience:** The update introduces resilience approaches to the Comprehensive Plan. These additions will guide the District in becoming an equitable, livable city that can respond to both human-made and natural shocks and stressors, including displacement and other risks posed by climate change and public health emergencies. The update includes a supplemental Resilience Crosswalk that highlights the new cross-cutting policies and actions in the Citywide and Area Elements.
5. **Public resources:** The update introduces a civic infrastructure policy to facilitate coordination of master facilities plans across parks, schools, libraries, and recreation centers. Recognizing that our streets and sidewalks are more than just conduits for cars and commuters, the updated Urban Design Element includes a public life section that addresses the use of these important public spaces for cultural life and celebration.

The update also includes language and tone changes to clarify and better reflect current policy. For example, in policies and actions directive words such as “should” and “encourage” replace mandatory language such as “shall,” “require,” and “must” to better reflect the Comprehensive Plan’s role as a guide. In addition, phrases like “protect neighborhood character,” which has been documented to have been used to perpetuate racial exclusion and segregation, has been replaced with “respect neighborhood character” to reframe this important objective using an inclusive tone. However, we retained phrases like “protect historic resources” because that remains consistent with our current historic preservation policy.

The update incorporates key policies and actions from Small Area Plans and other plans and studies completed during the life of the 2006 Comprehensive Plan. OP reviewed more than 40 plans completed by District and federal agencies and worked with agency staff to identify relevant policies and actions for inclusion in the updated Comprehensive Plan. For example, the updated Environmental Protection Element integrates goals and actions from Sustainable DC 2.0. Similarly, the updated Parks, Recreation, and Open Space Element reflects principles and guidance from the 2014 Parks Master Plan. The updated Community Services and Facilities Element incorporates conclusions of the 2018 Health Equity Report, highlighting key social determinants of health and differential health outcomes, as well as related health plans for

addressing these disparities. Based on the 2018 DC Public Education Master Facilities Plan, the update more clearly links DCPS and public charter school facility planning with population growth forecasts.

The update reflects recent data, including data from the U.S. Census Bureau's 2017 American Communities Survey. OP worked with several DC agencies to update their modeling based on this data. In some instances, the update retains 2015 data to provide greater context for the narratives presented. Some data points, such as commuter data in the Area Elements, were deleted due to the data no longer being collected. Finally, although the Comprehensive Plan has a horizon of 2025, additional forecasting and projections were included where available. For example, some forecasting and projections go to 2030 and 2045 in an effort to provide decision makers with well-rounded and robust information to aid in future implementation.

The updated Generalized Policy Map (GPM), which helps to guide land use decision-making in conjunction the Future Land Use Map and the Comprehensive Plan text and maps, includes for the first time Future Planning Analysis Areas, which are areas of large tracts and / or corridors that are anticipated for a change in density and intensity of use. In these locations, planning efforts will be undertaken to analyze land use and policy impacts and ways to support growth. The updated GPM also includes Resilience Focus Areas, where future planning efforts are anticipated to improve resilience to flooding, especially in areas within the 100- and 500- year floodplains. Finally, the updated GPM incorporates the boundary for the Proposed State of Washington, Douglass Commonwealth, which encompasses all of the District of Columbia, except an area around the Monumental Core that will remain a federal government enclave.

Finally, OP updated the Future Land Use Map (FLUM), which generally depicts the policies of the Land Use Element's intended uses for roughly 20 years into the future. In conjunction with other parts of the Comprehensive Plan, the FLUM serves as an important guide for zoning decisions. The land use designations on the map reflect the recommendations of small area plans completed since 2006. In addition, the updated FLUM reflects policies supporting continued focus for growth at metro stations and along corridors and anticipates the transfer of federal land.

#### Feedback from Public Review

Public and ANC feedback received during the public review period was very diverse. However, a handful of trends emerged:

- Most of the comments on the text were for the Housing, Transportation, Upper Northeast Area, Lower Anacostia/Near Southwest Waterfront Area, and Land Use Elements. Each of these elements received over 100 comments.
- Many comments were supportive of the draft Comprehensive Plan generally, in addition to specific issues such as equity, affordable housing, and accommodating needs of older adults and persons experiencing homelessness.
- Finally, most of the comments on the maps were requests for increased density on the FLUM along major corridors and additional Future Planning Analysis Areas on the GPM.

In responding to the comments received during public review, OP was guided by the following questions:

- Does the feedback align with the principles of the Comprehensive Plan? There are 40 guiding principles for the Comprehensive Plan and all revisions proposed must be in alignment with those principles.
- Is the feedback addressed sufficiently in one of the Comprehensive Plan Elements? We recognize that policies in one element of the Comprehensive Plan may support goals for other elements. For the sake of consistency, we place the context and description of a policy or action in one element, and where relevant to another element, we provide a cross reference.
- Is the feedback appropriate to incorporate into a Comprehensive Plan? The Comprehensive Plan is intended to provide high-level guidance for decision-making around the physical layout and environment of the District. It does not dictate zoning, create laws or programs, make budgeting decisions, or plan for operations of government.
- Has there been sufficient analysis and community engagement of the feedback to incorporate it? The open call process in 2016 was designed to solicit from the public a range of ideas about potential policies and actions, including new ideas that had not been analyzed by OP or vetted by community residents. However, this public review process was not designed to incorporate newly proposed and unvetted policies or actions. Moving forward, such ideas can be considered in other place-based planning work or in the Comprehensive Plan rewrite.

After analyzing over 1,000 comments we received from the public and approximately 1,500 comments we received from 33 ANCs across all eight wards, we updated the 10/15/19 draft, with the following results:

- Overall, 78% of the feedback was integrated, supported, or acknowledged in the Mayor's proposal.
- About 16% of the comments were incorporated as proposed, or with some modifications.
- About 62% of the comments were already captured in one or more parts of the Comprehensive Plan. In the Mayor's proposal, OP included cross-references for similar language across multiple chapters.
- The updates to the Future Land Use Map between the 10/15/19 draft and the Mayor's proposal created an additional 2.3% of land use capacity on less than 1% of land area (535 acres).
- Across all elements, we made updated language about parks and open space. ANCs from all Wards expressed interest in prioritizing safe, accessible, and activated open space.
- ANCs also prioritize the need for housing options to meet the needs of all residents. This feedback helped shaped new policies, actions, and expanded language across all elements to consider the housing needs of older adults, the LGBTQ+ community, people with disabilities, and other vulnerable populations.

- Access to all modes of safe transportation options was emphasized by ANCs. The Comp Plan was amended to include additional guidance on topics ranging from Vision Zero to truck routes.

As part of the legislation to adopt the Framework Element of the Comprehensive Plan, the DC Council included an amendment (Act A23-0127) which directed OP to develop a report to the Council to provide guidance related to the options for increasing the variety of housing types in single-family zones and the potential equity and affordability impacts. The report that OP has prepared in response recommends that the District pursue gentle density housing options in single-family neighborhoods in a targeted manner that prioritizes high-opportunity, high-cost neighborhoods near high-capacity transit. The report also finds that there are many potential affordability, equity, and environmental benefits to allowing additional housing options in single-family neighborhoods.

#### Suggestions for Comprehensive Plan Rewrite

As mentioned previously, this update was not a rewrite, yet the process offers some lessons and ideas for the next Comprehensive Plan rewrite, which should conclude in 2025. We offer the following suggestions, many based on public feedback we have received. Some of the suggestions may require legislation to implement:

1. Scope the plan with accessibility and inclusivity. Consider reducing the detail and length to make the document more accessible to a broader audience. The current redlined version of the document is more than 1,600 pages in length. It is a very technical and data-heavy document with language that some residents may find difficult to understand. National best practices in comprehensive planning indicate high-level, short, straightforward, goal-oriented plans are more user-friendly. In addition, they are easier to update and can be more responsive to changes in the city. Ultimately, the document should be useful and accessible to a variety of users, including planning staff, Councilmembers, ANCs, residents, landowners, and other stakeholders.
2. Consider the optimal process to both facilitate long-term planning while allowing for much-needed, more nimble updating. The process for the rewrite and future processes beyond the upcoming rewrite should consider utilization of concurrent planning efforts to inform the overall Comprehensive Plan. For example, a new District agency plan could be adopted as an amended Citywide Element or a new area plan could be adopted as an amended Area Element. This approach is similar to neighboring jurisdictions and best practices in the planning field.
3. Evaluate the maps needed, including the granularity of FLUM and GPM to distinguish them from parcel-level zoning maps. For example, previous iterations of the FLUM and GPM were generalized, most notably the FLUM from 1984, meeting the intention for their use as high-level guidance. However, as digital cartography technology improved, over time the maps have become a combination of generalized areas and fine-grained detailed areas. The



rewrite should consider whether the maps should reflect a generalized or parcel-level approach and maintain that approach through future amendments.

The update that we submit to you today reflects the best analysis, policies and actions that will prepare DC to manage the change ahead with an eye toward equity, resilience and shared prosperity. OP is proud that the update was informed by the contributions of thousands of District residents. We are committed to do what we can to support the adoption of this Comprehensive Plan in 2020, so that District residents will have the support we need to seize the opportunities and tackle the challenges ahead. OP stands ready to support the DC Council to this end.

Sincerely,

A handwritten signature in blue ink, appearing to read "Andrew Trueblood", with a long horizontal flourish extending to the right.

Andrew Trueblood